

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>WILLIAM J. HAMMONS,</b>	:	
	:	
Petitioner,	:	
	:	
v.	:	Civ. Act. No. 05-718-KAJ
	:	
<b>THOMAS L. CARROLL,</b>	:	
Warden, and <b>CARL C. DANBERG,</b>	:	
Attorney General for the State of Delaware,	:	
	:	
Respondents. <sup>1</sup>	:	

**MOTION FOR EXTENSION OF TIME TO FILE  
CERTIFIED STATE COURT RECORDS**

1. The petitioner, William J. Hammons, has applied for federal habeas relief challenging his June 2002 Delaware Superior Court conviction by guilty plea and sentence for second degree rape, first degree unlawful imprisonment, and third degree assault. D.I. 1. The undersigned filed an answer to the petition on February 3, 2006.

2. By the terms of the Court's order, the respondents are directed to attach to the answer certified copies of the state court records material to the questions raised in the petitioner's appeal.

3. Due to the large volume of record retrieval recently required by prosecutors in the appeals division, the undersigned has been unable to obtain the certified state court records in order to file them contemporaneously with the answer. The undersigned anticipates obtaining and copying the records on or before February 28, 2006.

---

<sup>1</sup> See FED.R.CIV.P. 25(d)(1). Attorney General Carl Danberg assumed office on December 8, 2005, replacing former Attorney General M. Jane Brady, an original party to this case.

4. Respondents submit that an extension of time to February 28, 2006 in which to file certified copies of the material portions of the state court records in this case is reasonable. Respondents submit herewith a proposed order.

/s/ Elizabeth R. McFarlan  
Deputy Attorney General  
Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 577-8500  
Del. Bar. ID No. 3759  
elizabeth.mcfarlan@state.de.us

Date: February 3, 2006